



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 31, 2013

The Honorable William H. Pauley
United States District Judge
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Chambers 2210
New York, New York 10007

Re: United States v. Frederic Cilins
13 Cr. 315 (WHP)

Dear Judge Pauley:

The parties respectfully submit this letter to request that the Court schedule a pre-trial conference for the purpose of setting a trial date in this matter. The parties ask that this hearing be set in December 2013.

By way of background, the parties appeared before the Court on September 12, 2013. At that conference, counsel for the defendant sought to adjourn the trial until 2014, in light of the recent appearance of additional defense counsel and the Government's pending motion to preclude certain evidence. The Court agreed to an adjournment, but no trial date was set at that time because the defense believed that the Court's ruling on the Government's pending motion would determine how long an adjournment the defense required. The Court stated during the September 12 conference that the next potential open trial date on the Court's calendar was February 3, 2014, or thereafter.

To facilitate the parties' preparation for trial, the parties ask that the Court schedule in December a status hearing in this matter. The parties understand that a trial date will likely be set upon issuance of the Court's decision on the pending motion and a further conference of the Court and parties.

The Government conferred with defense counsel, and defendant joins in this request.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: _____/s/_____
Elisha J. Kobre
Assistant United States Attorney
Tel. No.: (212) 637-2599

cc: William Schwartz, Esq.
Michelle Smith, Esq.
(via e-mail)